

## REMARKS

By the foregoing Amendment, Claims 5, 24, 25 and 28 have been amended. A marked up version showing the changes made is attached. Favorable consideration of the application. is respectfully requested.

5           Claims 24 and 28 were rejected under 35 U.S.C. 112, first paragraph, on the grounds that the overlay portion with the desired primitive was not found in the specification. Claims 24 and 28 have been amended so as to no longer recited the overlay portion, so that it is believed that the rejection of Claims 24 and 28 on this basis can be withdrawn.

10           Claims 5-6 and 25-26 were rejected under 35 U.S.C. 102(b) on the grounds of anticipation by Rhoden et al. Since Claims 24 and 28 were also discussed in this rejection, it is believed that the Examiner intended to rejected Claims 5-6 and 24-28 on these grounds. Claim 5 has been amended to recite "said control circuit specifying the shape of the optimal pixel pattern such that the accessing unit stores the pixel data into  
15   the memory with the minimum number of times of accessing the memory, under the condition that the optimal pixel pattern in a first access of the memory is commonly used in a subsequent access of the memory." Claim 25 similarly recites "said step of specifying a shape of comprises specifying the shape such that the accessing unit stores the pixel data into the memory with the minimum number of times of accessing the  
20   memory, under the condition that the shape of the optimal pixel pattern in a first access of the memory is commonly used in a subsequent access of the memory." Claim 28 also similarly recites "detecting, of plural pixel patterns formed on a predetermined coordinate

area including the coordinate data, at least one pixel pattern through which the accessing unit is allowed to access the memory and store the pixel data of the desired primitive."

Referring to column 4, lines 15-22 and 33-36, and Fig. 2 of Rhoden et al., the tiles of Rhoden et al. are dynamically modified by the access means to obtain a best fit of the

5 groups of pixels to the graphic primitives. In contrast, in the present invention, as is explained in the specification at page 36, once the optimal pixel pattern (interleave pattern) is selected, according to Table 1 of the specification, the selected pattern is commonly used in the memory access for accessing inside the triangle  $T_{HIJ}$ . It is

respectfully submitted that Rhoden et al. does not disclose, teach or suggest commonly

10 using a selected pattern that is first used in accessing memory in subsequent accessing of the memory, as is claimed. It is therefore respectfully submitted that Claims 5-6 and 24-28 are novel and inventive in over Rhoden et al., and that the rejection of Claims 5-6 and 24-28 on the grounds of anticipation by Rhoden et al. should be withdrawn.

Claims 7 and 27 were rejected under 35 U.S.C. 103(a) on the grounds of  
15 obviousness from Rhoden et al. in view of May. Claim 8 was also rejected as being obvious from Rhoden et al. However, it is respectfully submitted that neither Rhoden et al. or May disclose, teach or suggest commonly using a selected pattern first used in accessing memory in subsequent accessing of the memory, as is recited in Claims 5 and 25, that the claims are novel and inventive thereover, and that the rejection of Claims 7, 8  
20 and 27 on the grounds of obviousness should be withdrawn.

The Examiner indicated that the information disclosure statement filed November 8, 2000 had not been considered, as failing to comply with 37 CFR 1.98(a)(2) requiring a

legible copy of each U.S. and foreign patent, publication or other information listed.

Under MPEP 609, “the examiner will consider information which has been considered by the Office in a parent application when examining (A) a continuation filed under 37 CFR 1.53(b) .... and a list of the information need not be submitted in the continuation,

5 divisional, or continuation-in-part unless applicant desires the information to be printed on the patent.” Under 37 CFR 1.98(d), copies of the foreign patent references and other publications are required to be provided, even if they had been previously submitted in an earlier application, unless “(1) The earlier application is properly identified in the information disclosure statement and is relied on for an earlier effective filing date under  
10 35 U.S.C. 120; and (2) The information disclosure statement submitted in the earlier application complies with paragraphs (a) through (c) of this section.”


It is respectfully submitted that a list of the information was submitted, that the earlier application was identified in the information disclosure statement filed November 8, 2000, and that the earlier application so identified was relied on for an earlier effective  
15 filing date. It is further respectfully submitted that the information disclosure statement submitted in the earlier application complied with 37 CFR 1.98 paragraphs (a) through (c).

It is therefore respectfully submitted that all of the requirements under MPEP for listing the foreign patent references and other publications in the present patent were  
20 fulfilled, and that further copies of the foreign patent references and other publications should not required under 37 CFR 1.98(d). Consideration of the information disclosure statement is respectfully requested.

In light of the foregoing amendments and remarks, it is respectfully submitted that the application should now be in condition for allowance, and an early favorable action in this regard is respectfully requested.

Respectfully submitted,

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VERSION WITH MARKINGS TO SHOW CHANGES MADE

THE CLAIMS

5. (Amended) An apparatus comprising:

a processor for generating coordinate data specifying a desired primitive;

5 a pixel generator for generating pixel data of the desired primitive;

a control circuit for specifying a shape of an optimal pixel pattern according to the coordinate data generated by the processor;

an accessing unit for accessing a memory and storing the pixel data generated by the pixel generator into the memory according to [an] the optimal pixel pattern; and

10 [a] said control circuit [for] specifying [a] the shape of the optimal pixel pattern [according to the coordinate data generated by the processor] such that the accessing unit stores the pixel data into the memory with the minimum number of times of accessing the memory, under the condition that the optimal pixel pattern in a first access of the memory is commonly used in a subsequent access of the memory.

24. (Amended) An apparatus according to claim 5, wherein the control circuit detects at least one pixel pattern through which the accessing unit is allowed to access the memory and store the pixel data of the desired primitive [which includes an overlay portion with the desired primitive], and for outputting pixel pattern information indicating the detected at least one pixel pattern; and

said accessing unit accesses [a] the memory according to the pixel pattern information and stores the pixel data generated by the pixel generator into the memory in units of pixel data corresponding to the coordinate data [pattern].

25. (Amended) A method used in an apparatus which comprises a memory for storing pixel data, the method comprising the steps of:

generating coordinate data specifying a desired primitive;  
generating pixel data of the desired primitive;  
specifying a shape of an optimal pixel pattern according to the coordinate data generated by the processor;

accessing a memory and storing the pixel data generated by the pixel generator into the memory according to an optimal pixel pattern;

said step of specifying a shape of [the optimal pixel pattern according to the coordinate data generated by the processor] comprises specifying the shape such that the accessing unit stores the pixel data into the memory with the minimum number of times

of accessing the memory, under the condition that the shape of the optimal pixel pattern  
15 in a first access of the memory is commonly used in a subsequent access of the memory.

28. (Amended) A method according to claim 25, further comprising:

a step of detecting, of plural pixel patterns formed on a predetermined coordinate  
area including the coordinate data, at least one pixel pattern through which the accessing  
20 unit is allowed to access the memory and store the pixel data of the desired primitive  
[which includes an overlay portion with the desired primitive], and outputting pixel  
pattern information indicating the detected at least one pixel pattern; and

said step of accessing comprising accessing [a] the memory according to the pixel  
pattern information, and comprising storing the pixel data generated by the pixel  
25 generator into the memory in units of pixel data corresponding to the coordinate data  
[pattern].